

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	
	§	Case No. 22-31641-mv-7
GOODMAN NETWORKS, INC.	§	
	§	(Chapter 7)
Debtor.	§	
	§	
SCOTT M. SIEDEL, TRUSTEE	§	
	§	
Plaintiff,	§	ADVERSARY PROCEEDING
	§	NO: 23-03090-mvl
v.	§	
	§	
HUDSON CLEAN ENERGY	§	
ENTERPRISES, LLC, ALLIANCE TEXAS	§	
HOLDINGS, LLC; NEIL Z. AUERBACH,	§	
JUDITH AUERBACH, AUERBACH	§	
PARTNERS, L.P, JAMES GOODMAN,	§	
JAMES FRINZI, GOODMAN	§	
INVESTMENT HOLDINGS, LLC,	§	
GENESIS NETWORKS, INC., GENESIS	§	
NETWORKS GLOBAL SERVICES, LLC,	§	
AUERBACH CHILDREN’S DYNASTY	§	
TRUST U/A/D OCTOBER 9, 2012, and	§	
AUERBACH FAMILY DYNASTY TRUST	§	
U/A/D OCTOBER 9, 2012,	§	
	§	
Defendant(s).	§	

**UNOPPOSED MOTION TO EXPEDITE HEARING MOTION TO
WITHDRAW AS COUNSEL OF RECORD**

Wick Phillips Gould & Martin, LLP (“WPGM”) respectfully states as follows in support of this request (the “Motion to Expedite”) for an expedited hearing:

1. Concurrently herewith, WPGM filed its Unopposed Motion to Withdraw as Counsel of Record for Defendant James Frinzi (“Mr. Frinzi”) [ECF No. 23] (the “Motion to Withdraw”).

2. WPGM respectfully requests that the Court consider the Motion to Withdraw as soon as the Court's schedule permits.

3. WPGM estimates that a hearing on the Motion to Withdraw will last approximately 15 minutes or less, absent objection.

4. Undersigned counsel certifies that there is a true necessity for an expedited hearing and that WPGM did not create the need for an emergency hearing by a lack of diligence.

5. If the Motion to Expedite is granted, WPGM will promptly file a notice of hearing, which will be served via-email where possible.

WHEREFORE, WPGM respectfully requests that the Court enter an order substantially in the form attached hereto as **Exhibit A**, granting the relief herein and such other relief as the Court deems appropriate under the circumstances.

Dated: April 23, 2024

Respectfully submitted,

/s/ Jason M. Rudd

Jason M. Rudd, Tex. Bar No. 24028786

Paul T. Elkins, Tex. Bar No. 24092383

WICK PHILLIPS GOULD & MARTIN, LLP

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**COUNSEL FOR DEFENDANT JAMES
FRINZI**

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on April 19, 2024, he conferred by phone with Davor Rukavina, Counsel for Scott Seidel, Chapter 7 Trustee and Plaintiff. The Trustee does not oppose this Motion.

/s/ Jason M. Rudd

Jason M. Rudd

CERTIFICATE OF SERVICE

I hereby certify that on April 23, 2024, I electronically filed the foregoing with the clerk of the court using the CM/ECF system and have served a copy of the same to the following parties or their counsel via the method(s) indicated below:

Davor Rukavina

Thomas D. Berghman

MUNSCH HARDT KOPF & HARR, P.C.

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 X

Hand Delivery

Regular Mail

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/s/ Jason M. Rudd

Jason M. Rudd

EXHIBIT A
Proposed Order

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	§	
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ORDER GRANTING UNOPPOSED MOTION TO EXPEDITE HEARING

CAME ON FOR CONSIDERATION the request (the “Motion to Expedite”) for an expedited hearing on the Unopposed Motion to Withdraw as Counsel (the “Motion to Withdraw”), filed by Wick Phillips Gould & Martin, LLP. The Court finds that the Motion to Expedite should be granted as set forth below.

It is therefore ORDERED that the Motion to Withdraw is scheduled for expedited hearing on the date and time listed above.

END OF ORDER

PREPARED AND SUBMITTED BY:

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